

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re:)
) Bankruptcy Case No. 08-35653-KRH
CIRCUIT CITY STORES, INC., et al.,) Jointly Administered
) Chapter 11
Debtors.) Hon. Kevin R. Huennekens
)

MOTION FOR ADMISSION TO PRACTICE PRO HAC VICE

Neil E. McCullagh moves this Court for an Order permitting Angela S. Abreu (“Ms. Abreu”) to represent PNY Technologies, Inc. (“PNY Technologies”), *pro hac vice* in the above-styled bankruptcy cases and any related adversary litigation and in support of his Motion states as follows:

1. I am a member in good standing of the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia. I will be associated with Ms. Abreu in this matter. My business address and bar number are as follows:

Neil E. McCullagh (VSB #39027)
Spotts Fain PC
411 E. Franklin Street, Suite 600
Richmond, VA 23219

2. Ms. Abreu is a member in good standing of the Bar of the State of New Jersey, the state of her residence, as well as the Bar of the State of New York and the Bar of the Commonwealth of Pennsylvania, and is admitted to practice before the United States District Courts for the District of New Jersey, the Western District of Pennsylvania and the Southern and Eastern Districts of New York. Her business address is as follows:

Neil M. McCullagh, Esquire (VSB #39027)
Jennifer J. West, Esquire (VSB #47522)
Erin E. Kessel, Esquire (VSB #65360)
Spotts Fain PC
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Tel: (804) 697-2000 Fax: (804) 697-2100
Counsel for PNY Technologies, Inc.

McCarter & English
Four Gateway Center
100 Mulberry Street
Newark, NJ 07102

3. Ms. Abreu has not been the subject of disciplinary action by the Bar or courts of the State of New Jersey, or any other state or any Federal Court.

4. Ms. Abreu has not been denied admission to the courts of any state or to any federal court.

5. Ms. Abreu is familiar with the Federal Rules of Civil Procedure. She will become familiar with and at all times abide by the Local Rules of this Court and comply with those Rules so long as this cause is pending.

6. Ms. Abreu respectfully requests that she be allowed to appear before this Court to represent the interests of PNY Technologies.

WHEREFORE, Neil E. McCullagh prays that this Court grant his Motion to permit Angela S. Abreu to represent PNY Technologies, *pro hac vice* in this action, to shorten the notice period required pursuant to Rule 9013-1 for such Motion, and for such other and further relief as this Court deems just and proper.

PNY TECHNOLOGIES, INC.

By: /s/ Neil E. McCullagh
Counsel

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Counsel for PNY Technologies, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion was served by U.S. Mail, First Class, postage prepaid or electronic means on this the 20th day of November, 2009 to the following constituting all necessary parties:

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/s/ Neil E. McCullagh